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The Northeast Utilities System

DEC 9 1998

Docket Nos. 50-245

50-336

50-423

B17501

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

**Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3
Request for Closure of NRC Order dated October 24, 1996,
Requiring Independent, Third-Party Oversight of NNECO's
Implementation of Resolution of Employee Concerns**

In its submittal dated March 31, 1998,⁽¹⁾ Northeast Nuclear Energy Company (NNECO) reported to the NRC that it had established a Safety Conscious Work Environment (SCWE) at Millstone which supported the restart of Unit 3. On April 24, 1998,⁽²⁾ NNECO supplemented the March 31st letter, providing detailed plans for the transition of the SCWE organization from its recovery structure to a future equilibrium organization. In a Staff Requirements Memorandum of May 19, 1998, the NRC Staff also concluded that the work environment at Millstone supported the restart of Unit 3, subject to the continued oversight of Little Harbor Consultants (LHC). On that basis, the Commission approved the restart of Unit 3.

The work environment at Millstone remains healthy. Enhancements made to support the restart of Unit 3 have been institutionalized. In some cases, the improvements have been tailored to support an operational site, as opposed to a site in recovery. Other enhancements have been made in anticipation of the eventual departure of LHC. Consistent with these efforts, LHC has reported in its most recent quarterly report³ that Millstone continues to have a safety conscious work environment and that, in recognition of this, LHC has begun phase-out activities.

⁽¹⁾ NNECO letter B17138, "Establishment of a Safety Conscious Work Environment," dated March 31, 1998.

⁽²⁾ NNECO letter B17214, "Supplement to the Millstone SCWE Readiness Letter of March 31, 1998," dated April 24, 1998.

⁽³⁾ LHC letter, "Quarterly Report of Little Harbor Consultants," dated November 13, 1998.

Given these developments, it is time to determine whether the conditions which led to the imposition of the Commission's Order of October 24, 1996, (Order) still exist. The purpose of this letter is to demonstrate: (a) that NNECO has corrected the conditions which led to the imposition of the Order; (b) that the corrective actions taken to date have produced sustained, acceptable performance; and (c) that programs, plans, and processes are in place to continue to enhance future performance. Accordingly, NNECO requests that the Commission rescind the Order.

The Order contains four specific requirements, all of which have now been satisfied. Specifically:

- NNECO has submitted and implemented a comprehensive plan for (a) reviewing and dispositioning safety issues raised by employees and (b) ensuring that employees who raise safety concerns are not subject to discrimination.
- LHC has provided third-party oversight for NNECO's comprehensive plan implementation.
- The LHC's oversight of Millstone has been conducted in accordance with an NRC-approved plan which contains details regarding allegations.
- NNECO's performance demonstrates that the conditions which led to the requirement of the third-party oversight have been corrected.

The final requirement of the Order is the focus of this submittal. In determining that the conditions which led to the imposition of the Order no longer exist, NNECO has assessed its performance by: (a) continuing to evaluate its performance under the four success criteria originally used to determine its readiness for the restart of the units; and (b) assessing its response to recent challenges and comparing the causes of, and responses to, those events to the causes and responses which led to the imposition of the Order. Having determined that its performance merits the lifting of the Order, NNECO has in place an integrated plan to monitor the future work environment at Millstone and a specific action plan (the 1998-2000 Performance Plan) to enhance the work environment.

Since the first quarter of 1998, NNECO's performance under the four success criteria has remained acceptable. First - surveys, assessments, and performance monitoring consistently indicate that employees at Millstone are willing to raise concerns. Reliable data shows that virtually all employees are willing to raise concerns and over 90% will do so with their supervision. Second - NNECO's Corrective Action Program (CAP) continues to demonstrate that employees' issues are being effectively resolved by line management. A NNECO Independent Review Team conducted an assessment of the CAP in October 1998, and concluded that the program was performing satisfactorily and continuing to improve. Third - the NNECO Employee Concerns Program (ECP) continues to function effectively. Performance indicators reflect a reduction in the backlog of cases and in the time under investigation. Additional data confirms an

increase in customer satisfaction as well. Fourth - management has consistently demonstrated that it can effectively address concerns of retaliation and respond to events which could potentially harm the work environment. Continued training remains a hallmark of management's efforts to prevent retaliation. But when allegations arise or events occur, management has been actively involved in finding solutions to the issues.

Wholly apart from the assessment of these four success criteria, NNECO has also conducted a qualitative assessment of recent events to evaluate its response to these events and to determine whether the conditions which led to the imposition of the Order remain. This "Common Cause" review identified both strengths and weaknesses in management's responses to the events studied. Based upon their findings, the team developed recommendations and compared them to the actions contemplated in the 1998-2000 Performance Plan. To the extent that the Plan did not already address a recommendation, that Plan has been supplemented. Significantly, the review team concluded that the adverse conditions identified by the FCAT and the MIRG did not appear to be present in the recent events.

Satisfied that it has demonstrated sustained acceptable performance since at least January 1998, and satisfied that the conditions giving rise to the Order no longer exist, NNECO has begun implementation of plans to prevent backsliding and to enhance performance after the departure of LHC. To assure itself that it will continue to have a timely and accurate assessment of the work environment, NNECO has developed a SCWE Assessment Plan. That plan calls for the conduct of regular assessments and audits by a variety of company resources, e.g., self assessment by line management, Nuclear Oversight, Employee Concerns Oversight Panel (ECOP), and Nuclear Safety Assessment Board. Supplementing these internal reviews, NNECO will use external resources to provide independent and expert assessments of the work environment. Central to this effort will be hiring of LHC for the conduct of periodic reviews during the year following the rescission of the Order. The experience and insight obtained by LHC during its period of formal oversight will be invaluable to NNECO in gauging its continued performance and, more importantly, in finding new ways to improve the work environment at Millstone.

With accurate assessments of the work environment providing continuing feedback, management can adjust, as necessary, its ongoing 1998-2000 Performance Plan. NNECO began implementation of the Work Environment Section of that Plan during the first quarter of 1998. The purpose of this section of the Plan is to ensure that NNECO builds on the successes achieved thus far in the restoration of a healthy work environment so that the organization can perform at a higher and safer level in the future. The overall Performance Plan recognizes that future operational success in a competitive market depends upon the conduct of the safe operations in an environment which embraces open, candid communications.

As part of its oversight of Millstone and in anticipation of its consideration of a request for the lifting of the Order, the NRC Staff has conducted a number of inspections. During an August 1998 inspection, the Staff identified eight items which required some action and returned to Millstone for a follow-up inspection in October. NNECO has taken the action necessary, or provided the information, as appropriate, for each of the items and discussed its response with the Staff. In a public exit meeting conducted on November 24, 1998, the Staff indicated its satisfaction with NNECO's responsive actions for the eight items.

In addition, NNECO's oversight groups, the Nuclear Oversight organization and the Nuclear Safety Assessment Board (NSAB) have separately concurred that the conditions which led to the establishment of the Order have been corrected.

For all these reasons, NNECO requests that the Commission rescind the Order.

Attachment 1 identifies the regulatory commitments in this letter.

Attachment 2 is a more complete discussion of the facts and data supporting this request for rescission.

Attachment 3 is an outline of the specific requirements set forth by the Commission in its Order of October 24, 1996, and an outline indicating how NNECO has complied with each of those requirements.

Attachment 4 is the latest update of the Work Environment Focus Area of the 1998-2000 Performance Plan to be incorporated into the next revision of the Performance Plan. NNECO provided an earlier version of this document when it submitted its letter of March 31, 1998, before the restart of Unit 3.


Attachment 5 reports the status of NNECO's SCWE Transition Plan. Again, this document is an update of the plan submitted by NNECO in its submittal of April 24, 1998.

Attachment 6 is the SCWE Assessment Plan Matrix. As noted above, the SCWE Assessment Plan will provide the basis for NNECO's monitoring of the work environment after the rescission of the Order.

If there are any questions on the information provided in this letter, please contact Mr. John T. Carlin at 860-437-5938.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY


Leon J. Olivier
Senior Vice President and
Chief Nuclear Officer

Attachment 1
Attachment 2
Attachment 3
Attachment 4
Attachment 5
Attachment 6

cc: H. J. Miller, Region I Administrator
W. M. Dean, Director, Millstone Project Directorate
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Attachment 1

**Millstone Nuclear Power Station, Unit Nos. 1, 2, 3
Regulatory Commitments**

December 1998

List of Regulatory Commitments

The following table identifies those actions committed to by NNECO in this document.

Commitment Number	Regulatory Commitment	Committed Date or Outage
B17501-01 ⁽¹⁾	The Human Services Organization will be restructured based on performance and assessment as part of the strategic organizational realignment at Millstone.	12/31/99
B17501-02 ⁽²⁾	NNECO will remove contractual restrictions which preclude LHC from pursuing, for a specified period following closure of the Order, future work opportunities at NU facilities.	1/31/99

⁽¹⁾ This modifies commitment B17138-02, NNECO letter B17138, "Establishment of a Safety Conscious Work Environment," dated March 31, 1998.

⁽²⁾ This modifies B16232-01, NNECO letter B16232, "Proposed Third Party Oversight of Comprehensive Plan for Reviewing and Dispositioning Safety Concerns Raised by Employees, Response to Request for Additional Information," dated February 14, 1997.

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Attachment 2

Millstone Nuclear Power Station, Unit Nos. 1, 2, 3

**Information Demonstrating that the Conditions Which Led to the Imposition of
Independent Third Party Oversight at Millstone Station Have Been Corrected**

December 1998

Information Demonstrating that the Conditions Which Led to the Imposition of Independent Third Party Oversight at Millstone Station Have Been Corrected

I. Introduction

The Commission's Order of October 24, 1996, contains four requirements. The first three requirements were either administrative in nature or directed at LHC. Attachment 3 provides a summary of the individual requirements of the Order and the actions taken to address each requirement. The fourth requirement of the Order is the focus of this attachment.

The fourth requirement of the Order provides that "[t]he plan for independent third-party oversight will continue to be implemented until the Licensee demonstrates, by its performance, that the conditions which lead to the requirement of that oversight have been corrected to the satisfaction of the NRC." As discussed below, NNECO's review of Millstone's performance and supporting data demonstrate that the conditions which led to the imposition of the Order have been corrected.

II. NNECO has Addressed the Fourth Requirement of the October 24, 1996, Order

The conditions which led to the imposition of the Order were the subject of two significant inquiries. First, in May 1996, NNECO established a Fundamental Cause Assessment Team (FCAT) which identified three fundamental causes in the decline in Millstone's performance:

- Senior management did not consistently exercise effective leadership and articulate and implement appropriate vision and direction;
- The Nuclear organization did not establish and maintain high standards and expectations; and
- The Nuclear organization's leadership, management, and interpersonal skills were weak.

These same general themes were apparent in a second inquiry — the NRC's Millstone Independent Review Group (MIRG). The MIRG reached five principal conclusions about the work environment at Millstone:

- The large number of concerns being brought to the NRC indicated that NNECO's programs were ineffective in resolving employees' concerns;
- Managers who were responsible for discrimination were not appropriately disciplined;

- Management was ineffective in implementing corrective action;
- Management was reluctant to admit mistakes; and
- Managers lacked the skills necessary to handle their employees' concerns and were generally not supportive of those employees.

NNECO's March 31, 1998, letter⁽¹⁾ provided data and described how these causes had been addressed to the point where a safety conscious work environment had been established. Since the submission of that letter, NNECO has continued to enhance the quality of its work environment and to focus attention on implementing corrective actions to address the conditions which led to the issuance of the Commission's Order. During the past year, NNECO has assessed its performance by using four principal success criteria: (1) the willingness of the employees to raise concerns; (2) the effectiveness of dealing with issues, largely measured by the effectiveness of the Corrective Action Program; (3) the effectiveness of the Employee Concerns Program; and (4) the effectiveness of management's response to allegations of harassment, intimidation, retaliation, and discrimination. NNECO's letter of March 31st provided an assessment of each of these criteria as of that date and concluded that Millstone's performance in each of these areas was satisfactory for restart. A review of Millstone's performance since that time indicates that overall performance remains satisfactory to support station operation and continues to improve.^{(2),(3)} This sustained performance demonstrates that the fundamental causes identified by the FCAT and MIRG have been corrected.

A. NNECO Continues to Satisfy Its Four SCWE Success Criteria

The following discussion updates the information provided in the March 31st submittal. Specific SCWE assessment and performance data is provided in NNECO's Second and Third Quarter Performance Reports.^{(2),(3)}

The First Success Criterion

The first success criterion requires that the employees at Millstone be willing to raise safety concerns. Performance monitoring and assessments continue to confirm that the workforce not only possesses the willingness to raise concerns, but it also has the confidence that the concerns will be addressed with commitment, respect and timeliness; and with no fear of retaliation.

⁽¹⁾ NNECO letter B17138, "Establishment of a Safety Conscious Work Environment," dated March 31, 1998.

⁽²⁾ NNECO Letter B17379 "Millstone Nuclear Power Station, Unit 3 - Second Quarter Performance Report," dated August 11, 1998.

⁽³⁾ NNECO Letter B17380 "Millstone Nuclear Power Station, Unit 3 - Third-Quarter Performance Report," November 16, 1998.

In February 1998, LHC conducted structured interviews which indicated that 100 percent of Millstone employees would raise a concern if they became aware of a problem that could affect the safe operation of the plant. Consistent with these results, the most recent Millstone Leadership Assessment, performed in the second quarter of 1998, found that over 98 percent of supervisors were rated as effective in handling employee concerns. In addition, the highest scores in the Leadership Assessment were on management's willingness to listen to employee concerns and a heightened sensitivity to concerns by management, both of which were rated as "very effective." In the third quarter of 1998, a survey conducted by NNECO's Employee Concerns Oversight Panel (ECOP) reached similar conclusions. In the ECOP survey, 91 percent of respondents indicated that if they had a concern, they would raise it with their immediate supervisor.

A NNECO sponsored Culture Survey, conducted in the second quarter of 1998, indicated that over 86 percent of respondents agreed that their work area supported a willingness to raise concerns. Although this number does not meet NNECO's long-term goal of 90 percent, it is a four percent increase from the previous survey conducted in the fourth quarter of 1997. When considered in conjunction with the numbers from the Leadership Assessment, this data shows that in most cases employees will raise concerns to their immediate supervisor. Moreover, 94 percent of respondents to the ECOP survey indicated that they would use the Employee Concerns Program (ECP) if they were reluctant to approach their supervision.

Employee willingness to raise concerns also finds support in the increasing number of issues that are being brought to Human Resources (HR) for resolution. A discussion of the renewed credibility of HR is provided under Criterion 4.

ECP data confirms that employees are willing to raise concerns. Since the beginning of 1998, ECP has received about 20 concerns per month. Given that the ECP addresses concerns of all kinds – not just those related to SCWE issues – these numbers reflect a respected organization and a workforce willing to use it. Despite the relatively stable number of concerns being filed, the egregiousness of the concerns has diminished. The number of concerns alleging potential violations of 10CFR50.7 has been steadily declining.

The Second Success Criterion

The second success criterion requires that management effectively resolve issues. This issue is fundamental to creating a normal, healthy environment, where employees see issues resolved effectively and efficiently by management through normal processes, primarily the Corrective Action Program (CAP). NNECO has made substantial reforms and progress in upgrading the quality of its CAP, and improvements continue.

In February 1997, NNECO established and implemented a site-wide Corrective Action Program. To ensure that sufficient management focus was applied across the station, a Director and three Managers, one for each Unit, were put in place to implement and improve the program. Because of its importance to the success of the station, this program was included as a Key Issue for restart of the units. The leadership of the CAP has been instrumental in changing the culture of the station to be responsive to issues identified by individual contributors, self-assessments, and oversight organizations. The effectiveness of the process to identify problems and concerns, properly classify the significance of those issues, develop action plans in a timely manner, and implement the actions is continually monitored. Issues are being addressed in a timely manner as part of normal line process for resolution of concerns. Personnel identifying the issues are apprised of the actions to be taken to resolve the issues and are provided the opportunity to provide feedback on the plan. Assessment of the effectiveness of the actions taken is performed through self-assessments, trending, and independent review. Recurrence of significant problems is identified as an adverse trend and are monitored by senior leadership.

As reported in the March 31st letter, the CAP was reported as "ready for restart" of Unit 3. In SECY-98-119,⁽⁴⁾ the NRC staff stated that the CAP, as assessed relating to the establishment of a SCWE, was acceptable. In a Staff Requirements Memorandum,⁽⁵⁾ the NRC concluded that NNECO's corrective action program was adequate to support the restart of Unit 3, and noted that the lasting effectiveness of the corrective action program can best be assessed by evaluating long-term performance. The CAP at Unit 3 continues to be successfully implemented as reported in recent updates to the NRC.^{(6),(7)}

The success path that has been achieved on Unit 3 is similarly being pursued on Unit 2. In September and October, 1998, a NNECO Independent Review Team (IRT) performed an assessment of the Unit 2 CAP. The assessment concluded that the program was adequate, contained the necessary elements, and was continuing to improve. Unit 2 Corrective Actions are currently tracking to satisfactory, with assessments continuing. Overall, the Millstone site Corrective Action Program continues to be effective in resolving issues as determined by self assessments and internal independent reviews.

⁽⁴⁾ SECY-98-119, "Remaining Issues Related to Recovery of Millstone Nuclear Power Station, Unit 3," dated May 28, 1998.

⁽⁵⁾ Staff Requirements Memorandum 98-119, "Remaining Issues Related To Recovery Of Millstone Nuclear Power Station, Unit 3, And Briefing On Remaining Issues Related To Proposed Restart Of Millstone Unit 3," dated June 15, 1998.

⁽⁶⁾ NNECO Letter B17379 "Millstone Nuclear Power Station, Unit 3 - Second Quarter Performance Report," dated August 11, 1998.

⁽⁷⁾ NNECO Letter B17380 "Millstone Nuclear Power Station, Unit 3 - Third Quarter Performance Report," November 16, 1998.

The Third Success Criterion

The third success criterion requires that the Employee Concerns Program (ECP) operate effectively. NNECO's ECP is operating effectively and continues to improve.

In the second and third quarters of 1998, the enhanced Millstone ECP was both assessed and benchmarked by utility peers. An external assessment of the ECP effectiveness, conducted by General Public Utilities (GPU) Nuclear, identified ten strengths of the program and no weaknesses. GPU specifically noted that the Millstone ECP establishes a standard for the nuclear industry. At the request of another utility, Ontario Hydro, NNECO gave a presentation on the elements of the Millstone ECP and SCWE, to provide input and benchmarking for improving their respective programs and work environments. In addition, at one of the recent NRC public meetings, LHC noted that the Millstone ECP could be considered "near world class."

NNECO's performance indicators also continue to show sustained performance of the Millstone ECP. As of the end of October 1998, customer satisfaction has been steadily improving, the backlog of concerns under investigation has been eliminated, and time to complete an investigation has been reduced, on average, by about one half, to 26 days. The median age of concerns under investigation is 24 days. The ECP staff now consists primarily of NNECO personnel; the reliance on contractor support has been significantly reduced and the expertise has been transferred in-house.

The ECP has also improved its processes to be more efficient and customer service oriented. For example, all participants involved in an ECP investigation receive a feedback form to solicit information about ECP performance during the investigation. In addition, to ensure the Concernee is aware that the concern has been fully resolved, the ECP sends a letter providing notification when corrective actions have been completed. These changes reflect a program that learns from its experiences and from assessments, and strives to continuously improve its service to the Millstone workforce. The process enhancements have borne results. The vast majority of those who have used the ECP have stated that they would use the program again.

The Fourth Success Criterion

The fourth success criterion requires that management demonstrate that it can recognize and successfully respond to allegations of harassment, intimidation, retaliation, and discrimination, or other circumstances creating a chilling effect. To achieve success under this criterion and, more importantly, to achieve and sustain a safety conscious work environment, NNECO has focused on steps necessary to: (a) prevent retaliation from taking place in the first instance, and (b) take prompt, appropriate remedial action if retaliation occurs.

The initial actions taken to address the above steps were discussed in the March 31st letter. There have been no substantiated cases involving a potential violation of

10CFR50.7 at Millstone since August 1997 (the MOV incident). This is testimony to the training and sensitivity of the leadership, the workforce empowerment, and the effectiveness of the corrective actions to establish and sustain the Millstone SCWE.

Preventing Retaliation. The training programs that NNECO has established continue to be refined and enhanced. NNECO has implemented a "quick start" process for new leaders so they can be rapidly provided the training and tools they need to work effectively in a SCWE. The "quick start" process includes a video tape providing immediate indoctrination into SCWE concepts, the SCWE Handbook, and a training requirements memorandum. Each new leader is responsible for viewing the video tape, reading the handbook, and completing the required SCWE training courses: "Managing for Nuclear Safety"; "Fitness for Duty and Civil Treatment for Managers," "Employee Relations"; and "SCWE."

The "Employee Relations" course is a new training module recently introduced that replaces the Management Action Response Checklists (MARC) training. The objective of this training is to provide supervision with the interpersonal skills and knowledge of the NU / Millstone HR policies and procedures necessary to establish and maintain effective employee relations. This training includes a discussion of:

- Partnership responsibilities between HR and Line Management
- Employee Coaching / Counseling
- Personnel performance documentation
- Discipline guidelines
- Grievance and Dispute resolution processes
- Recognition / Response to claims of retaliation
- Recognition / Response to potential chilling effects

On an even broader level, a "Setting the Winning Standard" (or "Vision and Values") workshop, designed to engage the workforce in implementation of the vision and mission of the company, and to help transition the workforce to an operational and business focus, is currently being provided to the Millstone team – the leadership, the employees, and long-term contractors. Begun in August 1998, approximately one-third of the team has already completed the workshop. The workshop focuses on the concept of teambuilding to continue to foster an open environment, with continuous feedback and communications, and a strong sense of accountability in setting the winning standard. Integral to this winning standard is establishing Millstone as the industry benchmark for a safety conscious work environment. In addition, the workshop includes a change management model and introduces methods to allow employees to provide each other with feedback on behaviors.

Further enhancements to SCWE-related training are planned, as specified in the Work Environment Section of the 1998 - 2000 Performance Plan (updated and provided as Attachment 4). To follow-up and build on the initial SCWE training NNECO plans to conduct SCWE refresher training for the management team. This training will review

the key principles taught in the initial course, drawing on examples from recent events. The planned topics for discussion include management's response to allegations of discrimination and chilling effects, contractor supervision, managing employees engaged in protected activity, and balancing communication of event details to the workforce with respect for personnel privacy of employees.

To maintain and mature the Millstone SCWE, NNECO continues to provide resources to the leadership team. In particular, an integrated Human Services organization, including the SCWE organization, ECP and Human Resources, work together to champion the SCWE concept, to resolve issues, and to coach and counsel the leadership as more and more issues are resolved through normal line action and processes. The Human Services team meets daily to address ongoing and emergent SCWE-related issues, ensuring responsibility and schedules are assigned for follow-up and closure. The effectiveness of this integrated team continues to serve the organization well. At public meetings between the NRC, LHC and NNECO, on July 15, August 27, and November 24, 1998, LHC reported that it not only continues to see a workforce that is willing to bring issues and concerns forward, and that management continues to remain focused on SCWE, but that the ongoing training, the daily Human Services meetings, the Executive Review Board, and the ongoing ECP improvements, continue to ensure the SCWE is sustained. Further, LHC stated that the detection and prevention of issues was becoming more frequent than after the fact mitigation, and that the emerging issues were less severe. Significantly, LHC also reported that it had observed an unexpectedly rapid renewed credibility in Human Resources (HR), and the increased resolution of issues via normal processes (i.e., line management and HR) versus the extraordinary SCWE measures that have been established.

Recently, NNECO filled the position of Vice-President - Human Services with a permanent selection. To ensure an effective transition, the incoming and outgoing Vice-Presidents conducted a methodical and gradual turnover in responsibilities. This permanent appointment ensures the Human Services organization will maintain its structured role, and will continue to provide the focus on sustaining and improving the Millstone SCWE. The new Vice-President is now the Chairman of the Executive Review Board (ERB) which continues to review all proposed discipline more serious than a verbal reprimand to (1) ensure that the discipline is based on legitimate reasons and not on any protected activity, and (2) to anticipate and counter any potential chilling effect.

The Human Services organization remains a resource-heavy organization, designed to achieve the recovery of the work environment. But NNECO has started to implement a deliberate, performance-driven transition to a more equilibrium Human Services organization. NNECO's submittal of April 24, 1998,⁽⁸⁾ provided the principles and mechanisms for this transition. The ground work for these transitions has occurred as outlined in the April submittal, driven not by schedule, but by performance and the

⁽⁸⁾ NNECO letter B17214, "Supplement to the Millstone SCWE Readiness Letter of March 31, 1998," dated April 24, 1998.

requirements of the workforce. As discussed previously, Millstone is seeing many more issues being resolved by line management and HR. Consistent with this performance, resources are being applied to HR to support this normalizing trend. These changes are consistent with the planned transition, along with other complementary functional transfers. A current status of these function transfers is provided in Attachment 5.

NNECO had previously committed in the March 31st submittal that "[t]he Human Services organization will be maintained as currently structured until Unit 2 is restarted. Any change to the SCWE area will be based on performance." NNECO would like to modify this commitment. Based on progress to date, and the upcoming site restructuring (see below, Section III. A), Human Services will be restructured based on performance and assessment as part of the strategic organizational realignment at Millstone.

The efforts to detect potential areas where a healthy work environment is either in jeopardy or suspect also continue, but like the ECP concerns the severity of these areas is decreasing. Concurrently, the Human Services team is now identifying these areas sooner and providing support and counsel to resolve potential issues before they evolve. Consequently, what would have been previously characterized as Focus Areas are now more appropriately identified as SCWE Cases as NNECO is becoming more responsive to issues before they start to cause a degradation in the work environment. A formal process is in place to identify, prioritize, correct and assess SCWE Cases. SCWE Cases, and the remaining Focus Areas, are tracked as a Key Performance Indicator.

ECOP Role

ECOP is in the process of being restructured to better serve the organization as it moves forward. A new charter has been approved and a deliberate transition is in progress. The future ECOP will consist of a panel to advise the President and CEO, serving as his eyes and ears in monitoring the health of the Millstone SCWE. ECOP's focus will be on networking with the workforce to maintain a pulse on the SCWE, and on monitoring the culture change at Millstone.

This transition is appropriate for two primary reasons. First, ECOP came into existence before NNECO identified and gathered the internal and external resources necessary to squarely address the needs and deficiencies in the work environment. As the additional resources were developed and integrated into an effective team, ECOP's role changed. For example, the creation of the ERB substantially eclipsed original responsibilities concerning employee discipline. Over time, ECOP has evolved into an organization which primarily serves as the eyes and ears of the President and CEO. Second, the performance of NNECO and the progress it has achieved in improving the work environment permit ECOP to take on a more advisory monitoring role and less of an oversight role. This change in focus also capitalizes on the skills traditionally contained within ECOP. Its members are not necessarily chosen for their "human

services" expertise. Rather, they bring to bear their experience in the workforce, their relationships with co-workers, their perception of people and events, and their common sense. These attributes are better suited to fulfill an advisory role.

This change in ECOP's focus does not reflect a diminished stature. To the contrary, by relieving ECOP of its oversight responsibility, the members will be able to devote attention to providing input to the President and CEO. The restructuring of ECOP will be controlled with appropriate turnover and overlap.

B. Recent Performance Results

The most recent performance reports on the Millstone SCWE are included in the Second and Third Quarter Performance Reports for Millstone Station / Unit 3.⁽⁹⁾⁽¹⁰⁾ As discussed above, the recent assessments and performance indicators qualitatively and quantitatively demonstrate sustained performance and progress. NNECO will continue to provide the NRC with updates on the Key Issue of SCWE, as committed to in the Backlog Management Plan Update - Second Quarter 1998.⁽¹¹⁾

Common Cause Review

The Human Services organization has recently completed a structured analysis of the original causes of Millstone's Safety Conscious Work Environment (SCWE) performance issues, NNECO's subsequent experience in responding to SCWE-related events, and the current status of NNECO's actions to address underlying causes of SCWE-related performance. The analysis report is available on site for NRC review and evaluation.

The analysis began with an identification of the underlying causes of SCWE-related performance issues at Millstone. The two existing major analyses of the causes — the NU-sponsored FCAT report, and the NRC-sponsored MIRG — were reviewed in an effort to establish a baseline set of causes as of late 1996, when NU began extensive efforts to restore a SCWE at Millstone. That review disclosed that the causes identified in both reports were similar in kind but articulated and organized somewhat differently. In order to facilitate future analysis and establish a common language for discussion, a side-by-side comparison of the respective FCAT and MIRG causes was performed. From this comparison, a set of common causal factors was derived to represent the underlying causes of SCWE-related performance at Millstone in late 1996.

⁽⁹⁾ NNECO Letter B17379 "Millstone Nuclear Power Station, Unit 3 - Second Quarter Performance Report," dated August 11, 1998.

⁽¹⁰⁾ NNECO Letter B17380 "Millstone Nuclear Power Station, Unit 3 - Third Quarter Performance Report," November 16, 1998.

⁽¹¹⁾ NNECO Letter B17287, "Backlog Management Plan Update - Second Quarter 1998," dated June 30, 1998.

Since July 1997, Millstone management has faced challenges from a number of SCWE-related events. The Common Cause review focused its review of the major SCWE-related events with several basic questions in mind: (1) how and why did the events occur; and (2) how might those events have been avoided or mitigated? The Review Team was looking for not only how poorly or how well management responded, but also whether management responses reflected improvement over time.

On the basis of the analysis, the Common Cause review team concluded that: (1) the basic causes of Millstone SCWE-related performance issues have been addressed and appear to be resolved; (2) the Work Environment Section of the 1998 - 2000 Performance Plan is well-designed to address the major residual causal factors; and (3) with implementation of some additional actions Millstone can sustain and improve its SCWE. The additional recommendations include actions already in progress (e.g., Human Services organization transition, SCWE refresher training, and deliberate organization realignment), and additional enhancements to processes which are being tracked for completion in the site Corrective Action Program.

On a qualitative level, the collective evaluation of events over time reveals that those events that do occur are increasingly both less frequent and severe. This observation is consistent with the available ECP data which show declines in total concerns and alleged HIRD concerns and no substantiated 10CFR50.7 concerns for over a year. Further, the organization and its processes are more mature and generally intervene to catch issues at an earlier stage. This is borne out by the success of the Human Services group and maturation of the ERB. In parallel, the workforce appears more patient, if not more trusting, in allowing the system to work in resolving issues. While no quantitative data are available to conclusively demonstrate this, the ECP customer satisfaction data are supportive.

Disposition of Open / Emergent Issues

The ECP intends to continue to conduct reviews of open ECP concerns to ensure that any issues that have bearing on Unit 2 restart and Unit 1 license basis changes for decommissioning have been appropriately dispositioned (including operability, reportability, compliance with design and licensing basis, and compliance with regulations). Additionally, the SCWE organization intends to continue to evaluate the open SCWE Cases / Focus Areas to ensure that there are no issues within these areas which would impact Unit 2 restart or Unit 1 decommissioning. Finally, NNECO also intends to review any SCWE-related items in the corrective action program for relevance to Unit 2 restart and Unit 1 decommissioning.

III. Future Initiatives to Sustain the Millstone SCWE

Attachment 4 provides the current update to the Work Environment Section of the 1998 - 2000 Performance Plan. Details of the Plan structure were provided in the March 31st submittal. The Plan is a living document and as such will continue to evolve as dictated by performance and lessons-learned. The Plan is available on site for NRC review and evaluation.

Implementation of the Plan is well underway and will continue to provide the path forward. The action items not only target specific improvements in SCWE functions and processes, they are also part of, and support, the planned transition of the Human Services organization as discussed above. The results of these actions have been positive. The continued improvements in the ECP, in SCWE training, and the renewed credibility of Human Resources, demonstrate that NNECO remains on a path of continuing improvement.

A. Organizational Realignment

NNECO is preparing for a site-wide organizational realignment as the site moves away from a recovery situation and towards a more equilibrium operating site. The proposed organization streamlines the management structure and aligns positions more closely with the needs of the site as a whole. There will be fewer and different management positions representing an approach which moves the emphasis from individual units in recovery to an integrated management structure for a station with two operating units and a third unit in a decommissioning mode.

NNECO has carefully and deliberately incorporated the necessary SCWE elements into this realignment. Input has been solicited from the Millstone workforce. A "bottom-up" review of the proposed organization was conducted by nearly 70 teams and many dozens of individual contributors. As a result, about 41 percent of the positions had some change to their level of control, or reporting relationship. These changes included maintaining the head of the ECP at a "Director" position, and maintaining a vice-president position as the head of Nuclear Oversight. The draft Millstone organizational realignment was presented to the Millstone team on September 14 and 15, 1998. Regular communications to the workforce, including a regularly updated "Web" page, have provided "question and answers" on the realignment.

Under the sponsorship of the Vice-President of Human Services, an organization transition task team was formed to coordinate people, process, and procedure change sequencing to ensure safety, regulatory compliance, and a SCWE are maintained during the transition. Organizational development consultants have been hired to facilitate the realignment, and are specifically providing training and counseling to affected personnel.

B. SCWE Assessment Plan

SCWE Action Item C.2.d.4 of the 1998 - 2000 Performance Plan provides a high level description of the SCWE Assessment Plan NNECO is implementing. This plan includes provisions for early detection of issues which, if not corrected, could result in erosion of SCWE results NNECO has achieved to date.

NNECO intends, on an annual basis, to reevaluate the SCWE Assessment Plan and to make changes as indicated based on performance achieved. In addition, the SCWE Transition Plan indicates that the results from these assessments will also be an important performance input in pacing the transition of SCWE related functions from a recovery organization to an equilibrium organization. A more detailed description of this plan is available for on-site NRC inspection.

The SCWE Assessment Plan also integrates contributions from various internal and external assessment activities. Currently planned internal (NNECO) activities include use of self-assessments, appropriate Nuclear Oversight audits and surveillances, and periodic feedback from NSAB and ECOP. Currently planned external assessments include continued contributions from the Nuclear Committee Advisory Team to the NU Board of Trustees and third-party assessments. Attachment 6 describes these plans in more detail.

LHC Role

NNECO is convinced that its on-going third-party assessment plan will be substantially more effective if Little Harbor Consultants could conduct several multiple week assessments during the one year period following closure of the ITPOP Order. The basis for NNECO's desire to retain LHC is that they are highly qualified to provide an independent assessment of the Millstone SCWE and have a full understanding and appreciation of the Millstone work environment and how it has evolved over the last several years.

NNECO intends that the existing LHC contract would be terminated when the Order is rescinded. NNECO would then put in place a new contract between NNECO and LHC which includes provisions to adequately maintain LHC's independence. In addition, NNECO envisions that a provision would be included which would permit the results of the LHC audits to be made available to the NRC and members of the public.

Commitment Change

In addition, this correspondence serves to update the NRC of NNECO's intention to modify NNECO's contractual relationship with LHC. In a January 30, 1997, letter,⁽¹²⁾ the NRC sought clarification of NNECO's intentions to place contractual restrictions on

⁽¹²⁾ NRC letter, W. D. Travers to B. D. Kenyon, dated January 30, 1997.

future work LHC may seek to perform at NU facilities. The NRC correspondence suggests that this clarification may have been considered by the NRC Staff in assessing whether the proposed independent third party contractor met the independence criteria of the Order. In a subsequent letter,⁽¹³⁾ NNECO indicated that contractual restrictions would be put in place which would preclude LHC from seeking new work at any NU facility for a period of twelve months following closure of the Order. Although NNECO has found no docketed correspondence that suggests formal NRC approval of this contractual provision took place, NNECO has been tracking this item as a regulatory commitment. Accordingly, and after addressing any concerns the NRC may have, NNECO intends to revise its current contract with LHC to remove a clause which restricts LHC from pursuing other work at NU facilities for a period of time following completion of its work under the Order.

IV. Conclusion

The Commission's Order of October 24, 1996, provided that independent third-party oversight would continue until NNECO's performance demonstrated that the conditions which led to the imposition of the Order had been corrected. Those conditions no longer exist.

Senior management has exercised visible leadership and active daily involvement in establishing a healthy work environment. It has established high performance standards and an intolerance for any action which interferes with or jeopardizes the uninhibited communication of employee concerns. To encourage the raising of concerns and to ensure the effective resolution of those concerns, NNECO has rebuilt the Corrective Action Program and the Employee Concerns Program. More importantly, management has recognized that, more than any program, good leadership builds trust and resolves employee concerns. Employees have demonstrated that they are willing to raise concerns with the confidence that the concerns will be addressed with commitment, respect, and timeliness.

NNECO requests rescission of the Order based on the development of effective leadership which treats people with respect and an empowered workforce who holds themselves and management accountable for behaviors consistent with a SCWE.

NNECO recognizes that this good performance is not necessarily self-sustaining. To ensure that progress continues, NNECO will continue efforts to monitor and develop the work environment after closure of the Order. Internal and external reviews will continually provide for the integrated assessment of the Millstone work environment. Management will continue to take the lead in resolution of employee concerns and in the implementation of the 1998 - 2000 Performance Plan. As Millstone prepares for

⁽¹³⁾ NNECO letter B16232, "Proposed Third Party Oversight of Comprehensive Plan for Reviewing and Dispositioning Safety Concerns Raised by Employees, Response to Request for Additional Information," dated February 14, 1997.

operational and organizational changes to achieve operational excellence, management will keep the maintenance of a safe, healthy work environment central to the decision making process and central to the core values of the organization.

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Attachment 3

Millstone Nuclear Power Station, Unit Nos. 1, 2, 3

**Requirements of the NRC Order, dated October 24, 1996, and
NNECO's Actions in Compliance**

December 1998

**Requirements of the NRC Order, dated October 24, 1996, and
NNECO's Actions in Compliance**

The information below indicates how the four requirements of the Order have been addressed.

1. Requirement of Order

"Within 60 days from the date of this Order, the Licensee shall develop, submit for NRC review, and begin to implement a comprehensive plan for (a) reviewing and dispositioning safety issues raised by its employees and (b) ensuring that employees who raise safety concerns are not subject to discrimination. The comprehensive plan shall address the root causes of past performance failures as described in the Licensee's July 12, 1996, report of the Fundamental Cause Assessment Team and the NRC's September 1996 report of the Millstone Independent Review Group, with the objective of meeting a goal of achieving a safety-conscious environment."

Status

NNECO's comprehensive plan was submitted to the NRC and implemented on January 31, 1997.⁽¹⁾ Based on recommendations from the independent third party (Little Harbor Consultants) the remaining open items were rolled into the Safety Conscious Work Environment Comprehensive Plan which was submitted on the docket on December 11, 1997.⁽²⁾ The remaining ongoing items, that are part of the continuous improvement strategy, are included as the Work Environment Section of the 1998 - 2000 Performance Plan.⁽³⁾

2. Requirement of Order

"Within 30 days from the date of this Order, the Licensee shall submit, for NRC approval, a proposed independent, third-party organization to oversee implementation of the above comprehensive plan. The independent third-party shall be approved by the NRC and its activities, under this Order, are subject to continuing NRC oversight. The independent third-party shall oversee plan implementation by (a) observing and monitoring the Licensee's activities; (b) performing technical reviews; (c) auditing and investigating, when necessary, cases of alleged harassment, intimidation, and discrimination; (d) auditing and reviewing the Licensee's handling of employee safety concerns; and (e) assessing and monitoring the Licensee's performance. Within 30 days of the NRC's approval of the third-party, an oversight plan for conduct of this third-

⁽¹⁾ NNECO letter B16154, "Comprehensive Plan for Reviewing and Dispositioning Safety Concerns Raised by Employees," dated January, 31, 1997.

⁽²⁾ NNECO letter B16905, "SCWE Comprehensive Plan," dated December 11, 1997.

⁽³⁾ Previously provided by NNECO letter B17138, and updated in this submittal as Attachment 4.

party oversight shall be developed by the third-party and forwarded for NRC review. NRC approval of the oversight plan is required prior to its implementation. Reports on oversight activities, findings, and recommendations shall be provided to both the licensee and the NRC at least quarterly following NRC approval of the oversight plan. The plan shall specify procedures for concurrent reporting of oversight activities, findings, and recommendations to the NRC and the Licensee. The Licensee will provide a response to each recommendation. The Licensee's comprehensive plan shall allow for revisions based upon the Licensee's experience in implementation of its plan and comments and recommendations of the independent third-party and/or the NRC."

Status

- The independent third-party organization was proposed to the NRC in letters dated December 23, 1996, January 14, 1997, and February 4, 1997.⁽⁴⁾
- Based on NRC letters dated July 14, 1997, and August 19, 1997, LHC was approved as the ITPOP Contractor.
- LHC's Oversight Plan and Revision 1 of the Oversight Plan were submitted to the NRC on May 2, 1997, and June 13, 1997, respectively. Revision 2 of the Oversight Plan was submitted on March 20, 1998.
- The NRC approved Revision 1 the Oversight Plan on July 14, 1997, and Revision 2 on April 30, 1998.
- Based on recommendations from the independent third party (Little Harbor Consultants) the Comprehensive Plan was revised and updated as the Safety Conscious Work Environment Comprehensive Plan, which was submitted on the docket on December 11, 1997.⁽⁵⁾
- LHC has held eleven meetings with NNECO and the NRC which were open for public observation on May 13, June 3, July 22, September 24, November 13, 1997; January 27, March 3, April 7, July 16, August 27, and November 24, 1998. LHC has made a number of recommendations during these meetings. LHC has also made additional recommendations in a number of docketed letters. NNECO has provided written responses to these recommendations, except for six recent recommendations provided in

⁽⁴⁾ NNECO letters B16116, B16153, and B16230, dated respectively, December 23, 1996, January 14, 1997, and February 4, 1997: "Proposed Third Party Oversight of Comprehensive Plan for Reviewing and Dispositioning Safety Concerns Raised by Employees."

⁽⁵⁾ NNECO letter B16905, "SCWE Comprehensive Plan," dated December 11, 1997.

the latest LHC quarterly report.⁽⁶⁾ These six new recommendations are specific to enhancements to the ECP investigation process. The ECP itself is described by LHC as "among the best in the industry." The majority of the LHC recommendations have been closed by LHC, the remainder are currently being addressed by ECP.

3. Requirement of Order

"If the independent third-party receives allegations of safety concerns, it is to encourage the allegor to bring those concerns to the attention of the Licensee. If the allegor elects not to do so, the independent third-party is to encourage the allegor to report the concerns to the NRC. If the allegor does not elect to report the safety concerns to either the Licensee or the NRC, the independent third-party is to accept the allegation and forward it directly to the NRC. The independent third-party is to develop procedures for protecting the identity of any such allegors and limiting the disclosure of the allegors' identity to those with a need to know."

Status

Little Harbor Consultants Oversight Plan, submitted and approved as indicated in Requirement 2, above, contained the required controls for disposition of allegations.

4. Requirement of Order

"The plan for independent, third-party oversight will continue to be implemented until the Licensee demonstrates, by its performance, that the conditions which led to the requirement of that oversight have been corrected to the satisfaction of the NRC."

Status

See Attachment 2 for a discussion of NNECO's basis for concluding that the conditions which led to the imposition of the Order have been satisfied.

⁽⁶⁾ LHC letter, "Quarterly Report of Little Harbor Consultants," dated November 13, 1998.

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Attachment 4

Millstone Nuclear Power Station, Unit Nos. 1, 2, 3

**1998 – 2000 Performance Plan - Work Environment Focus Area Update
(to be incorporated into next revision of the Performance Plan)**

December 1998

WORK ENVIRONMENT

The Long-Term Vision

The WORK ENVIRONMENT Strategic Focus Area includes the following overarching accomplishments:

- Leadership is strong and continually improving;
- Clear standards of performance and accountabilities are established, communicated and embraced by the organization;
- A healthy safety conscious work environment exists where all employees feel comfortable that any issues they raise will be addressed with commitment, respect, and timeliness;
- The employee concerns program is effective, continuously improving, held in high regard by employees, and viewed as an industry leader;
- The workforce is motivated, respectful, and has pride in personal, team, and organizational accomplishments;
- Compensation is competitive and based on performance; and
- Employees have a high quality of life, both at work and in their personal life.

The strategic focus area of Work Environment encompasses:

- Leadership
- Safety Conscious Work Environment
- Human Resource Performance

This section summarizes initiatives specifically targeted at improving the work environment at Millstone Station. While only the areas of Leadership, Safety Conscious Work Environment (SCWE), and HR Performance are specifically included in this Strategic Focus Area, other topics discussed in the 1998 - 2000 Performance Plan (Plan) affect our SCWE in some fashion, and contribute to improvements on this front. In particular, our actions in the areas of safety and operating excellence will fundamentally influence and determine our success in sustaining improved performance in regard to SCWE.

Significant progress has been made since issuance of the NRC Order in October of 1996. The Work Environment initiatives will be carried out by the responsible organizational units that are presently reporting to the Vice President, Human Services. These functions are coordinated through meetings amongst the leaders of the

responsible functions (HR, ECOP, SCWE, Legal, ECP, etc.) and more recently, through a rapid response protocol developed for urgent events.

As performance dictates, these organizational relationships will be re-examined and adjusted as follows:

- All changes to the Safety Conscious Work Environment (SCWE) organizations and processes will occur based on performance demonstrated and results achieved, and not based on schedule;
- Most non-10CFR50.7 SCWE functions ultimately will transition to the Human Resources organization, and over time, the demands on HR would be reduced because of increased line management effectiveness;
- The scope of the Employee Concerns Program (ECP) will be reduced to focus primarily on nuclear safety significant issues, consistent with typical programs at other nuclear facilities;
- The Employee Concerns Oversight Panel (ECOP) will evolve to an independent panel, similar to Nuclear Safety Assessment Board, continuing to report to our President and CEO;
- Consistent with regulatory consent and dependent upon solid performance, the gradual and conservative reduction in the degree of independent oversight. This reduction could include periodic (e.g., quarterly) independent evaluations until results and self-assessments demonstrate that the independent oversight presence is no longer warranted; and
- Self-assessment will be used to verify that performance expectations are being met. Self-assessment will be considered effective when internal oversight or external evaluations have limited value because they simply validate self-identified issues. The measures to assess performance are stated in the SCWE segment of this Plan. These self-assessments are designed to assure that the progress realized to date is sustained, any backsliding is promptly detected, and corrective actions are promptly taken.

While this plan maintains our present organizational strengths, it also seeks to shift our emphasis from mitigative to more effective preventive actions. As we have identified and addressed the major causes of past SCWE performance issues, we have used these insights to refocus and retarget our actions, accelerating toward our performance improvements. Our plan does that with three interrelated components:

- Leadership
- Safety Conscious Work Environment
- Human Resources Performance

In the area of Leadership our initiatives focus on:

- Skill Development - Ensure management attendance to requisite training, measure leadership effectiveness and adjust training as appropriate
- Standards and Expectations - Establishing, communicating and reinforcing consistent standards and management expectations
- Succession Planning - Establish plans to prepare for the transition from recovery organizations and ensuring qualified candidates are identified to fill vacated positions on short notice.
- Self Assessment - Use of mentoring to improve Leadership effectiveness and to ensure continuous improvement.

In the area of Safety Conscious Work Environment our initiatives focus on:

- Lessons Learned – Systematically evaluate SCWE events and experiences, identify important lessons learned and adjust / augment our actions accordingly
- Training – Conduct an integrated assessment of SCWE-related employee, supervisory and management training and implement more efficient and effective SCWE-related training
- Organizational Structure – Based on assessments of SCWE performance objectives and measures, deliberately transition into the organizational realignments needed to maintain effective and efficient management of SCWE activities
- Monitoring and Methodology / Tools – Improved monitoring of SCWE performance and develop methodology / tools to improve the effectiveness and efficiency of SCWE activities

In the area of Human Resources Performance our initiatives focus on:

- Organizational Diversity
- Personnel Management
- Personnel Development
- Cultural Improvement

C.1 Leadership Goal

Leadership throughout the Millstone organization is strong and continually improving. Standards of performance and accountability are clear. Supervisors are providing meaningful and constructive feedback – both oral and written – and the organization is well coached by the leadership team. The leadership provided by the management team is perceived as a strength by the employees, INPO, the NRC and the general public.

Objectives, Performance Measures and Targets

Item No.	Objective	Performance Measure	Performance Targets
C.1.a	Leadership skill development has been provided to all personnel in supervisory positions	Requisite Management Training Attendance	90% by 10/99
		Requisite Management Requalification Training Attendance	90% by 10/99
		Leadership Assessment	> 5.5 (Reflecting an improvement of at least 5% average of all categories) No Leaders are ranked "less than effective" in two consecutive assessments (Complete by 11/98)
		"Skip Level" Leadership Surveys	Maintain or improve upon level achieved in summer 1998 survey

Item No.	Objective	Performance Measure	Performance Targets
C.1.b	Leaders are personally committed to the establishment and nurturing of a Safety Conscious Work Environment (SCWE)	Leadership Survey and PII Culture Survey (Employees Willing to Bring Concerns to Immediate Supervisors)	90% of respondents would bring concerns to their immediate supervisor.
		Millstone Employee Concerns Confidentiality Trend (anonymous or confidential employee concerns filed)	No adverse trends in requests for confidentiality or anonymity, based on analysis of concerns and data.
		PII Culture Survey	Continuing positive trend
C.1.c	Leaders are committed to high standards of performance and establishing clear expectations for their employees	Assessment Index (self-assessments results vs. nuclear oversight results)	Line Self-Assessments are more critical, indicated by a + index value.
C.1.d	Leaders embrace Millstone's Core Values: Do what is right; Respect and care for the individual; Be a team, Be customer focused	"Skip Level" Leadership Surveys	Maintain or improve upon - level achieved in summer 1998 survey
C.1.e	Safety is the first priority for all in a leadership position and is sponsored as such to their employees.	"Skip Level" Leadership Surveys	Maintain or improve upon level achieved in summer 1998 survey

Item No.	Objective	Performance Measure	Performance Targets
C.1.f	Leaders have planned for succession and phase out of recovery teams	Plans to transition from recovery to operating organizations developed and in place.	Plans in place 3 months after realignment
		Actions required by Transition Plans completed on schedule.	Recovery Teams are phased out and replaced by NU line management within 6 months of unit restart

Action Items

Item No.	Action	Responsibility	Target Date	Supporting Plan Ref./Status
C.1.a.1	Develop the metric for "skip level" leadership assessments and conduct the assessments at least annually in 1998, 1999, and 2000	HR	5/98	Complete
C.1.a.2	Incorporated into C.1.a.4			
C.1.a.3	Supervisors provide meaningful and constructive feedback, both oral and written, and good coaching as measured annually by leadership surveys and the LINKS process	HR	3/99	
C.1.a.4	Develop a leadership program curriculum that includes a continuous learning approach and utilizes industry best practices and aligns to the Millstone Organization.	Training	3/31/99	
C.1.a.5	Conduct Leadership Training - Training will be provided to all incoming/promoted management personnel.	Training	Ongoing	
C.1.a.6	Conduct Leadership Assessments	HR	6/98 11/98	Complete
C.1.b.1	All managers and supervisors complete initial SCWE training	Line Mgmt	11/98	Complete
C.1.b.2	Complete the evaluation of the need for additional leadership training, particularly with respect to SCWE issues and all the related ramifications and schedule periodic reevaluations.	SCWE	10/98	Complete

Item No.	Action	Responsibility	Target Date	Supporting Plan Ref./Status
C.1.b.3	Conduct PII Culture Survey	SCWE	7/98	Complete
C.1.b.4	Complete development and implement the SCWE Guidebook which provides the process for addressing leadership inadequacies	SCWE	4/98	Complete
C.1.c.1	Deleted			
C.1.e.1	Deleted			
C.1.e.2	Develop and implement management transition plan to replace recovery teams with NU line management within six months of each unit restart	Officers	7/99	
C.1.f.1	All managers and above will have developed a succession plan	Line Mgmt	3 mos after Realign-ment	

C.2 Safety Conscious Work Environment Goal

A safety conscious work environment (SCWE) exists whereby all members of the NU Nuclear team feel comfortable with, and accept responsibility for, raising any issue important to them with high confidence that the issue will be addressed with commitment, respect and timeliness. Our Employee Concerns Program should set the standard to which others in the industry aspire.

Objectives, Performance Measures and Targets

Item No.	Objective	Performance Measure	Performance Targets
C.2.a	Establish and maintain high confidence that employees are willing to raise concerns	Leadership and PII Culture Survey - (Willingness to Raise Concerns)	90%.
		Millstone Employee Concerns Confidentiality Trend	No adverse trends in requests for confidentiality or anonymity, based on analysis of concerns and data.
C.2.b	Establish and maintain high confidence that management is effective in evaluating, prioritizing, and resolving employee issues	Condition Report Evaluation Timeliness (Time for Condition Report (CR) Evaluation)	CR average age \leq 30 days.
		Condition Report Quality Score (condition report quality)	Condition Report Quality Score is \geq 3.0 on a scale of 0.0 to 4.0.
		Overdue Corrective Actions (overdue corrective actions from Level 1 or 2 CRs)	Overdue corrective actions are $<$ 3% during recovery and 1% after restart.

Item No.	Objective	Performance Measure	Performance Targets
C.2.c	Establish and maintain high confidence that the Employee Concerns Program (ECP) is continuously improving and effective in addressing issues raised by employees that are not resolved satisfactorily by other means within the organization	Employee Concern Resolution Timeliness (average age of unresolved concerns)	No Adverse Trend
		Employee Satisfaction With ECP (Employees using ECP would use it again, ECOP survey data)	A substantial majority (70%) of employees indicate they would use the program again.
		NU Concerns and NRC Allegations Received.	No quantitative Goal. It is desirable to have a relatively small number of allegations submitted to the NRC as a measure of employee confidence in the various NU resolution systems.
		Investigation Quality	Positive Trends

Item No.	Objective	Performance Measure	Performance Targets
C.2.d	Establish and maintain high confidence that line management is effective in identifying, investigating, and resolving focus areas and 50.7-related events, where the attributes of a SCWE are challenged or lacking	Substantiated Concerns Involving Potential Violations of 10CFR50.7	Infrequent and Handled Effectively
		Supervisory and Management Training Attendance	95% of requisite training completed and Requalification maintained

Action Items

Item No.	Action	Responsibility	Target Date	Supporting Plan Ref./Status
C.2.a.1	Deleted			
C.2.a.2	Develop and implement 50.7 module for incorporation in "Partnership 2000" employee training	Training	7/98	Complete
C.2.b.1	Develop and implement "quick start" training for new managers and supervisors, and enforce 90 day window for new training	Training	4/98	Complete
C.2.b.2	Develop and implement integrated, one-stop supervisory training from current training courses	Training	5/98	Complete
C.2.b.3	Develop and implement 50.7-related Requalification / refresher training for managers and supervisors	Training	3/99	
C.2.b.4	Implement a peer review process by year-end 1998 including selection of a design committee	Line Mgmt	12/98	Complete
C.2.c.1	Conduct lessons learned reviews of completed ECP cases	ECP	Ongoing	
C.2.c.2	Provide increased staff training on investigation consistency and process, and interpersonal skills. Enhance the ECP continuing training program	ECP	6/98	Complete
C.2.c.3	Transition ECP from contractor-staffed to NU-staffed organization	ECP	12/98	
C.2.c.4	Develop and implement improved methodology for 50.7 case classification, elements of proof for 50.7 and HIRD investigations, investigation lessons learned	ECP	4/98	Complete
C.2.c.5	Develop metric to measure investigation quality	ECP	10/98	Complete

Item No.	Action	Responsibility	Target Date	Supporting Plan Ref./Status
C.2.d.1	Based on assessment of SCWE performance objectives and measures, evaluate and transition into the organizational structure necessary to maintain effective / efficient management of SCWE activities	SCWE	3/99	
C.2.d.2	Evaluate and implement phased plan for ECOP realignment, if dictated by performance	ECOP	12/98	
C.2.d.3	Evaluate and implement phased plan for realignment of SCWE functions, including transfer of non-50.7 HIRD functions from ECP and SCWE to HR, and incorporation of SCWE into the line organization	All	3/99	
C.2.d.4	Evaluate and implement phased plan for realignment of SCWE oversight in response to sustained, positive performance trends, including rampdown of LHC oversight (e.g., quarterly audits); develop and implement phased plan for complementary, enhanced oversight from Nuclear Oversight, ECOP, NSAB, self-assessment, and potentially third party assessments	All	10/98	Complete
C.2.d.5	Address all Focus Areas effectively, continuing use of organization effectiveness consultants, and factoring learning process from those activities into the permanent organization	SCWE	12/98	

Item No.	Action	Responsibility	Target Date	Supporting Plan Ref./Status
C.2.d.6	Complete the development of and implement the SCWE Guidelines, which provide the process for addressing Focus Area definition, action plan development, monitoring and close out.	SCWE	6/98	Complete
C.2.d.7	Develop and implement an improved set of performance measures for measurement of continuous improvement	SCWE	3/99	Nuclear Safety Indicator Complete
C.2.d.8	Systematically evaluate SCWE events and experience and identify causal factors and important lessons learned. Perform comparative analysis and baseline causal factors and current conditions against the MIRG Report. Implement enhancements, as appropriate.	All	8/98	Complete
C.2.d.9	Evaluate current SCWE Plan actions and adjust and augment as necessary to address causal factors and lessons learned	SCWE	8/98	Complete
C.2.d.10	Develop and implement process for ongoing systematic evaluations and assessments of lessons learned	SCWE	11/98	Complete
C.2.d.11	Conduct periodic benchmarking and implement methods for sharing lessons learned from highly rated plants	All	Ongoing	

Item No.	Action	Responsibility	Target Date	Supporting Plan Ref./Status
C.2.d.12	Enhance SCWE monitoring to include assessment Windows scoring criteria which requires: a) a Level 2 Condition Report to be initiated if a SCWE KPI reaches a 'yellow' indication in 2 consecutive months or if any SCWE KPI reaches 'red', and b) a Level 1 Condition Report, requiring formal root cause investigation, to be issued in the event of 4 consecutive 'yellows' or 2 consecutive 'red' windows	SCWE	10/98	Complete

C.3 Human Resources Performance Goal

Millstone recognizes that a strong site team is fundamental to sustaining full recovery and makes effective use of its human resources as a source of competitive advantage. It further acknowledges that achieving a high quality of work life balanced with strong worker productivity is the best way to meet the needs of all its stakeholders.

Objectives, Performance Measures and Targets

Item No.	Objective	Performance Measure	Performance Targets
C.3.a	Employees view the Human Resources (HR) organization as vigorously championing their issues to management	HR Customer Feedback	"Satisfactory" by 12/98 "Good" by 12/99 "Excellent" by 12/00
C.3.b	Management seeks HR as a resource for counsel and guidance	HR Customer Feedback	"Satisfactory" by 12/98 "Good" by 12/99 "Excellent" by 12/00
C.3.c	Diversity is valued and regarded as an integral component of the organization's ability to compete successfully	Organizational Minority and Female Staffing Diversity Events	Desired Levels by 12/98 ≥ 2 annually
C.3.d	A culture exists that holds dear demonstrating respect for one another, celebrating successes, embracing worthwhile work, maintaining reasonable work hours, fostering pride in personal, team, and organizational accomplishment, and engaging all workers, remembering the unique needs of shift workers	Human Resources Culture Survey Overtime Levels Nuclear Performance Incentive Plan Achievement	TBD Minimum of one event targeted at shift workers

Item No.	Objective	Performance Measure	Performance Targets
C.3.e	The workforce plan is in place that takes into consideration bench strength and employee development	Succession Plan	At least one candidate for each identified key position
C.3.f	Performance management is owned by line management, and along with coaching, is viewed as an important part of setting expectations and holding one another accountable	Performance Appraisal Schedule Adherence Audits of Performance Reviews Leadership Assessment, Performance Development Section	> 90% are performed as scheduled Overall audit rating of at least "Satisfactory" with regard to quality, including a development plan Positive trend in year-to-year assessment results
C.3.g	HR policies are viewed as consistent	HR Customer Feedback Ratings	"Satisfactory" by 12/98 "Good" by 12/99 "Excellent" by 12/00
C.3.h	Compensation strategy is aligned with industry benchmarks and with the organization's desired culture and business objectives	Competitiveness of Compensation Senior Management Evaluation	At Market by end of 1999

Action Items

Item No.	Action	Responsibility	Target Date	Supporting Plan Ref./Status
C.3.c.1	Continue to implement diversity initiatives in concert with line management and successfully implement and complete the Summer Hire Diversity Program	HR	10/98	Complete
C.3.d.1	Conduct at minimum the following self assessment activities: investigation record-keeping; 1997 exempt performance reviews; and implementation of a customer satisfaction methodology	HR	12/98	
C.3.d.2	Conduct vision and values workshop and development of teambuilding concept; introduce the "We" concept	Officers	3/99	
C.3.d.3	Implement "Working Backshift" module for affected workers (focus groups)	HR	3/99	
C.3.e.1	Develop and present a workforce plan that includes a methodology for implementing succession planning and workforce demographics analysis	HR	1/99	
C.3.f.1	Conduct an audit of the 1997 performance reviews for quality and timeliness. Present results to Millstone line-management for action	HR	8/98	Complete
C.3.g.1	Implement Unit 1 redeployment, including development and publication of an officer-approved process	Officers	4/98	Complete

Item No.	Action	Responsibility	Target Date	Supporting Plan Ref./Status
C.3.g.2	In concert with Corporate HR, review HR Northeast Utilities Policies (NUPs) to assure applicability to Millstone, competitiveness with benchmark companies, clarity, and consistency with industry practice	HR	4/99	
C.3.h.1	Develop, present, and gain approval for implementing broad banding at Millstone in 1999	HR	9/99	
C.3.h.2	Deleted			
C.3.h.3	Develop criteria for justifying senior level positions at Millstone Station, including the establishment of a multi-discipline task force by 4/98	HR	4/98 8/98	Complete Complete

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Attachment 5
Millstone Nuclear Power Station, Unit Nos. 1, 2, 3
Transition Plan Progress⁽¹⁾

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⁽¹⁾ Organization titles reflect post-realignment positions

Human Services Transition Plan Progress

ECP

CURRENT RESPONSIBILITIES TO BE CHANGED	PREREQUISITES	FUTURE RESPONSIBILITIES OR FUTURE OWNER OF TASK	CURRENT STATUS
Receives and investigates all employee issues	<p>ECP train or transfer trained investigators to Human Performance and Development (HPD)</p> <p>ECP and Human Performance and Development educate customers on capability and availability of new owners</p>	<p>Receives and investigates principally nuclear safety related issues and failed resolutions.</p> <p>Non 50.7 HIRD and employment related issues will be transferred to appropriate groups i.e. HPD, Security.</p>	<p>Ongoing</p> <p>Action plan developed by HR / ECP</p>
Largely contractor investigators	ECP obtain and train NU investigators	Largely NU investigators	In Progress - No. of contractors reduced

Human Services Transition Plan Progress

ECOP

CURRENT RESPONSIBILITIES TO BE CHANGED	PREREQUISITES	FUTURE RESPONSIBILITIES OR FUTURE OWNER OF TASK	CURRENT STATUS
Panel oversight function and staff functions are mixed.	Employee Concerns Oversight Panel Going Forward Plan approved by President and CEO	Panel and staff functions will be separated. ECOP Panel will retain oversight role	Charter approved - transition in progress
ECOP Staff Functions Surveys Assessments	Employee Concerns Oversight Panel Going Forward Plan approved by President and CEO	Move to HPD	Complete
Observations Oversight	ECOP, SCWE, ECP Train personnel or transfer staff	ECOP, SCWE, ECP	Complete
	ECP and Nuclear Oversight develop and implement an external and self assessment Plan	Responsibility divided between Nuclear Oversight and ECOP Panel	Complete
	ECOP and Nuclear Oversight Train personnel or transfer staff	Responsibility divided between Nuclear Oversight and ECOP Panel	Pending

Human Services Transition Plan Progress

ERB

CURRENT RESPONSIBILITIES TO BE CHANGED	PREREQUISITES	FUTURE RESPONSIBILITIES OR FUTURE OWNER OF TASK	CURRENT STATUS
Review and approve contractor discipline and reductions	ERB develop and implement case screening criteria ERB trains line and Contracts organization on screening criteria	Phased transfer of reviews into line with Contacts Department concurrence ERB would provide periodic assessments of actions. The assessment function would ultimately revert to senior management	ASSESSMENT COMPLETE - determined ERB should continue for the present.
Review and approve employee discipline and reductions	ERB develop and implement case screening criteria ERB trains line and HPD personnel on screening criteria	Phased transfer of reviews to line with HPD concurrence ERB would provide periodic assessments of actions. The assessment function would ultimately revert to senior management	Ongoing
Advise management on issues/precursors	ERB trains Business Partners and HPD	HPD	Pending

Human Services Transition Plan Progress

HR

CURRENT RESPONSIBILITIES TO BE CHANGED	PREREQUISITES	FUTURE RESPONSIBILITIES OR FUTURE OWNER OF TASK	CURRENT STATUS
Onsite Senior HR presence in tandem with Vice President of Human Services.	Establish more responsive corporate Human Resources support	Vice President of Human Services, with Director level management providing day-to-day guidance and oversight of HPD organization.	Senior HR presence has decreased as needs have decreased. There is still frequent communication and periodic visits

Legal

CURRENT RESPONSIBILITIES TO BE CHANGED	PREREQUISITES	FUTURE RESPONSIBILITIES OR FUTURE OWNER OF TASK	CURRENT STATUS
Outside senior level counsel onsite	Legal department hires or assigns NU Counsel. Onsite senior counsel trains NU Counsel	Dedicated NU counsel experienced in nuclear and personnel issues onsite	Ongoing - To complete prior to 1st Quarter 1999 - NU Counsel on site 80 % of time

Human Services Transition Plan Progress

Little Harbor

CURRENT RESPONSIBILITIES TO BE CHANGED	PREREQUISITES	FUTURE RESPONSIBILITIES OR FUTURE OWNER OF TASK	CURRENT STATUS
Oversight and Assessments	ECP and Nuclear Oversight develop and implement an external and self assessment plan Little Harbor concurs with assessment plans	Periodic External Assessments Increased Self-Assessment ♦ Line ♦ Nuclear Oversight ♦ NSAB ♦ ECOP	Ongoing, with reduced frequency - Recent events observed by LHC confirmed management is handling issues well
Surveys Observations Interviews Issue Intake	These areas are presently being performed by NU groups. They will be consolidated into the departments as defined in this matrix	Human Performance and Development ECP, ECOP	Ongoing

Human Services Transition Plan Progress

Nilsson & Associates

CURRENT RESPONSIBILITIES TO BE CHANGED	PREREQUISITES	FUTURE RESPONSIBILITIES OR FUTURE OWNER OF TASK	CURRENT STATUS
Culture Change Support Team Development Leader Coaching Interventions Communication Training Outage Support	Nilsson and Associates develop and train line organization and Human Performance and Development staff	HPD	Facilitators trained Teambuilding working on Unit 2 and 3 Technology transfer planned for mid-1999

SCWE

CURRENT RESPONSIBILITIES TO BE CHANGED	PREREQUISITES	FUTURE RESPONSIBILITIES OR FUTURE OWNER OF TASK	CURRENT STATUS
Manager/Supervisor Assistance	SCWE train HPD	HPD	Ongoing
Focus Areas Management Culture Survey Chilling Effects Identification Interventions	SCWE Develop and document process Train or transfer Staff Educate customers on capability and availability of new owners	HPD	SCWE positions approved Case process in place HR staff training in progress

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Attachment 6

Millstone Nuclear Power Station, Unit Nos. 1, 2, 3

SCWE Assessment Plan Matrix

December 1998

Oversight Mechanism	Current Scope	Current Frequency/Intensity	Rationale for Current Oversight	Proposed Scope	Proposed Frequency/Intensity	Rationale for Proposed Oversight
LHC	Decreased intensity and man loading; Shifting toward event driven focus and areas of remaining weakness.	Continuous, with reduced man loading.	<ul style="list-style-type: none"> Intensive oversight required for establishment of SCWE and restart readiness. Assess NU's ability to perform Oversight role 	<p>Oversight of NU SCWE oversight plan, audit of selected topics, including Corrective Action Program.</p> <p>Review of ECP, HR, SCWE Case files</p>	Periodic reviews of Program	See Third Party assessments below
ECOP	<ul style="list-style-type: none"> Oversight Surveys ECP oversight Advisor to CEO Third Party reviews Witness ERB Review HIRD cases Network Observe Meetings Focus Groups 	Continuous; Panel meetings with CEO at >monthly intervals.	Intensive oversight required for establishment of SCWE and restart readiness.	<ul style="list-style-type: none"> Panel, 4 staff, administrator, with shift to advisory role. Review 50.7 HIRD cases Third party ECP reviews Witness ERB 	Continuous staff, monthly panel meetings with CEO.	Advisory role has highest value; Staff role should be re-examined in Summer 1999.

Oversight Mechanism	Current Scope	Current Frequency/ Intensity	Rationale for Current Oversight	Proposed Scope	Proposed Frequency/ Intensity	Rationale for Proposed Oversight
Human Services	<ul style="list-style-type: none"> • Self-assessments, • KPIs • Leadership/Culture Surveys. • Periodic Meeting 	<ul style="list-style-type: none"> • Limited Self-Assessments. • Continuous monitoring of KPIs, • Semi-annual surveys. • Periodic group reviews. 	Intensive efforts required to establish SCWE and support restart.	<ul style="list-style-type: none"> • Increased Self-Assessments. • Frequent assessments of KPIs, • Leadership, Culture survey. • Incorporation of ECOP survey into a "rollup" type survey feeding Culture Survey. • Common Threads / Lessons Learned 	Self-Assessment Plan reviewed by LHC, ECOP and Nuclear Oversight. KPI monitoring and surveys should continue current practice.	Increased emphasis on Self-Assessment will be necessary for sustaining excellence over the long term.
Nuclear Oversight	Assessment of Corrective Action Program (SCWE previously assessed by NOVRP - complete).	<ul style="list-style-type: none"> • Monthly surveillances of CAP activities • Annual audit of CAP activities. 	Audits required by Tech Specs. Surveillances necessary to support restart readiness	<ul style="list-style-type: none"> • Assessment of programmatic elements of SCWE. • Assessments of Corrective Action Program. 	Quarterly assessments of SCWE functions. Annual audit of CAP. Monthly CAP assessments until Unit 2 restart.	Nuclear Oversight should continue to assess programmatic elements of SCWE and CAP performance.

Oversight Mechanism	Current Scope	Current Frequency/ Intensity	Rationale for Current Oversight	Proposed Scope	Proposed Frequency/ Intensity	Rationale for Proposed Oversight
Officers	<ul style="list-style-type: none"> Review of KPIs Monthly review of ECP data Executive sponsor review of Key Issues 	Monthly	<p>Periodic review by management</p> <p>In depth review of Key Issues at intervals necessary to support issuance of NRC briefing book, Public Meeting, and presentations to NRC</p>	<ul style="list-style-type: none"> Review of KPIs Review of ECP data Bi- monthly reviews of Issues with Officers, direct reports, B. Kenyon <p>Executive sponsor review of Key Issues as part of quarterly update on previously resolved Key Issues</p>	Continuously	Requirement of good management
Corporate Center	None	None	None	<ul style="list-style-type: none"> ECP, SCWE, HR file quality 	Quarterly to Semiannual	Independent review using outside expertise

Oversight Mechanism	Current Scope	Current Frequency/Intensity	Rationale for Current Oversight	Proposed Scope	Proposed Frequency/Intensity	Rationale for Proposed Oversight
Third Parties (this will include LHC periodic reviews)	Currently under company auspices	None	None	<ul style="list-style-type: none"> Periodic formal Assessments of HR, ECP, SCWE processes files and effectiveness Specific assessments or investigations as necessitated by events. 	Periodically.	Augment assessment and investigate capability as necessary. LHC can best assess adequacy of NU programs on a periodic basis (LHC has established performance baseline.) Event management will drive SCWE performance. Performance Plan actions are key areas for improvement.
Other Utilities	ECP Program	Annual Audit	Outside Utility perspective	Review of selected elements of ECP and Nuclear Oversight effectiveness.	Annual audit through exchange programs. Similar to JUMA	Focus on specific areas of programmatic weakness.

Oversight Mechanism	Current Scope	Current Frequency/ Intensity	Rationale for Current Oversight	Proposed Scope	Proposed Frequency/ Intensity	Rationale for Proposed Oversight
ERB	<ul style="list-style-type: none"> Reviews all discipline above a verbal warning. Reviews all contractor reductions Provides advisory service on SCWE and HR issues 	Weekly or as needed	Intensive effort needed to establish SCWE	Same	As needed	We will continue to have a large contract workforce into early next year. As the number of cases decreases the frequency of ERB meeting can decrease.
NSAB	Review of KPIs, Nuclear Safety Index Restart Assessment	Quarterly	Restart verification	<ul style="list-style-type: none"> Continue reviews of KPI. Transfer to the Nuclear Safety Indicator 	Quarterly	Ongoing review of SCWE performance

Oversight Mechanism	Current Scope	Current Frequency/ Intensity	Rationale for Current Oversight	Proposed Scope	Proposed Frequency/ Intensity	Rationale for Proposed Oversight
NCAT	Regular visits to meet with employees and management, and subsequent reporting to the Nuclear Committee on the status of SCWE matters	Periodic	Reports its observations on SCWE matters to the Nuclear Committee	Same	Periodic	Provides independent source of information about SCWE conditions at the site. Identifies areas in which the Committee might seek further information from management or ways in which management might approach certain issues
Peer Review	None	None	None	Peer appeal process will provide another vehicle for employees to address their issues.	As requested	Increase Employee options